

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK**

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**NOTICE OF MOTION TO PERMIT SUFFICIENT TIME TO DEPOSE
NAMED DEFENDANT BYRON LOCKWOOD**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration, Plaintiffs, by their undersigned attorneys, will move the Court at the United States Courthouse for the Western District of New York, 2 Niagara Square, Buffalo, NY 14202, at a date and time to be determined by the Court, for an Order granting leave for sufficient time to depose Named Defendant Byron Lockwood pursuant to Federal Rule of Civil Procedure 30(d)(1).

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule of Civil Procedure 7(a)(1), Plaintiffs hereby state that they intend to file and serve reply papers. Pursuant to Local Rule of Civil Procedure 7(b)(2)(B), if the Court does not set deadlines by order, any opposition will be due within fourteen days of service of this Motion, and any reply papers will be due within seven days of service of the opposition papers.

Dated: June 1 2023

Respectfully Submitted,

/s/ Claudia Wilner

Claudia Wilner
Anjana Malhotra
Edward Krugman
NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE
50 Broadway, Suite 1500
New York, NY 10004
Tel: 212-633-6967
wilner@nclej.org
malhotra@nclej.org
krugman@nclej.org

Keisha Williams
WESTERN NEW YORK LAW CENTER
37 Franklin Street, Suite 210
Buffalo, NY 14202
Tel: 716-828-8415
kwilliams@wnylc.com

A. Chinyere Ezie
Baher Azmy
CENTER FOR CONSTITUTIONAL
RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel/Fax: 212-614-6464
cezie@ccrjustice.org
bazmy@ccrjustice.org

Jordan Scott Joachim
Christine Nelson
Andrew Timmick
COVINGTON & BURLING, LLP
620 Eighth Ave., Suite 4029
New York, NY 10018
Tel: 212-841-1000
Fax: 212-841-1010
jjoachim@cov.com
cnelson@cov.com
atimmick@cov.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2023, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Claudia Wilner